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**RECEIVED**  
AUG 19 2008  
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**VIA OVERNIGHT DELIVERY**

August 18, 2008

Ms. Kristine Koch  
Remedial Project Manager  
United States Environmental Protection Agency, Region 10  
Office of Environmental Cleanup, Mail Code ECL-115  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

Re: **Response to First Request for Information to Phillips Oil Co. (i.e., Phillips Petroleum Company), Tosco Corporation, and Unocal Corporation (i.e., Assets of 76 Products Company of Unocal) Portland Harbor Superfund Site Portland, Oregon**

Dear Ms. Koch:

This letter and its attachments constitute the initial response of ConocoPhillips Company, on behalf of Phillips Oil Co., (i.e., the former Phillips Petroleum Company) and the former Tosco Corporation ("ConocoPhillips"), to the EPA's First Request for Information letter, dated January 18, 2008, concerning the Portland Harbor Superfund Site (the "Site") in Portland, Oregon. ConocoPhillips also received a separate First Request for Information related to Unocal Corporation. The former Tosco Corporation purchased assets of 76 Products Company from Union Oil Company of California ("Unocal"), but was not a successor to Unocal. Nevertheless, the responses of all three entities, Phillips, Tosco, and Unocal 76 Products Company assets, are consolidated into the attached response.

ConocoPhillips has provided information regarding employees consulted in preparation of the response and requests that any contact with these employees be made through Derrick D. Vallance, Senior Counsel, ConocoPhillips Company, ML 1112, Litigation - Claims Group, 600 North Dairy Ashford, Houston, TX 77079, Phone (281) 293-2247.

The request from the EPA required that ConocoPhillips' response be accompanied by a declaration from a company representative. It is ConocoPhillips' position that neither Section 104 of CERCLA nor Section 3007 of RCRA contains requirements that the information and documentation submitted in response to this request include a



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records and conducted an investigation of its involvement with this Site, and we are confident that the responses contained herein are accurate to the extent that information is currently available.

ConocoPhillips will continue its efforts to locate additional information that may be responsive to this information request. Accordingly, nothing contained herein shall be interpreted or construed as an admission or waiver of any claims, rights or defenses of ConocoPhillips, and ConocoPhillips reserves any and all claims, rights and defenses relating to the matters addressed herein including the right to amend or supplement this response. Should such information or records be located or identified pursuant to these efforts, ConocoPhillips will provide supplements to this response.

Please direct any further communications regarding this matter to Willette A. DuBose, HS&E Legal Specialist, ConocoPhillips Company, ML 1126, Legal Environmental Group, 600 North Dairy Ashford, Houston, TX 77079, Phone (281) 293-6952.

Very truly yours,



William J. Lundeen  
ConocoPhillips Company  
Risk Management and Remediation  
Central Regional Manager

Enclosures

cc: Terry Lauck, Site Manager, RM&R, ConocoPhillips  
Ann Anderson, Claims Consultant, RM&R, ConocoPhillips  
Derrick Vallance, Senior Counsel, Legal, ConocoPhillips  
Willette A. DuBose, HS&E Legal Specialist, Legal, ConocoPhillips